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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

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Robert Thomson, P.E., R.E.M. Office of Federal Facility Remediation Direct Dial (215) 814-3357 Mail Code: 3HS11

Date: September 10, 2007

Ms. Linda L. Cole, P.E. NAVFAC MIDLANT, Code EV3 9742 Maryland Avenue Building N-26, Room 3208 Norfolk, VA 23511-3095

Re: Naval Weapons Station-Yorktown, Yorktown, Va. NPL site

Naval Supply Center - Cheatham Annex, Yorktown, Va. NPL site Review of draft Site Management Plan, Fiscal Years 2008-2009

Dear Ms. Cole:

Enclosed, please find the U.S. Environmental Protection Agency's (EPA's) comments pertaining to the review of the U.S. Navy's (Navy's) August, 2007 draft *Site Management Plan, Fiscal Years 2008-2009* for the investigation of the Naval Weapons Station-Yorktown (WPNSTA-Yorktown) NPL site, and the Naval Supply Center Cheatham Annex (NSC-CAX) NPL site:

- 1. Table 2-2 Cheatham Annex AOC 6 Penniman AOCs. Please note that the Penniman AOCs, as listed in Table 2-2, including (a) the Ammonia Settling Pits; (b) the TNT Graining House Sump; (c) the TNT catch (note spelling error) box ruins; (d) waste slag material; and (e) 1918 drum storage area, are Source Areas on the NPL. As such, they are required to have an RI, risk assessment, Proposed Plan, and ROD in order to be de-listed. Currently, they are described on Table 2-2 as AOCs, which may be misleading.
- 2. <u>Section 4.2.18</u> The description of the 5 Penniman sites should include a discussion of the designation of these 5 areas as Source Areas on the NPL.

This concludes EPA's review of the Navy's draft *Site Management Plan, Fiscal Years* 2008-2009 for the investigation of the WPNSTA-Yorktown NPL site, and the NSC-CAX NPL site. If you have any questions, please feel free to call me at (215) 814-3357,

Sincerely,

Robert Thomson, P.E., R.E.M.

Federal Facility Remediation (3HS11)

Cc: Wade Smith (VaDEQ, Richmond)